

1 Rena Andoh (admitted *pro hac vice*)
2 randoh@sheppardmullin.com.com
3 **SHEPPARD, MULLIN, RICHTER**
4 **& HAMPTON LLP**

30 Rockefeller Plaza
New York, NY 10112
Telephone: (212) 653-8700

5 Lai L. Yip (SBN 258029)
6 lyip@sheppardmullin.com
7 Four Embarcadero Center, 17th Floor
8 San Francisco, CA 94111
9 Telephone: (415) 434-9100

10 Travis J. Anderson (SBN 265540)
11 tanderson@sheppardmullin.com
12 12275 El Camino Real, Suite 100
13 San Diego, CA 92130
14 Telephone: (858) 720-8900

15 Kazim A. Naqvi (SBN 300438)
16 knaqvi@sheppardmullin.com
17 1901 Avenue of the Stars, Suite 1600
18 Los Angeles, CA 90067
19 Telephone: (310) 228-3700

20 Attorneys for Plaintiff and
21 Counterdefendant MOOG INC.

22 Rachel L. Fiset (SBN 240828)
23 rachel.Fiset@zfzlaw.com
24 Scott D. Tenley (SBN 298911)
25 scott.Tenley@zfzlaw.com
26 **ZWEIBACK Fiset &**
27 **ZALDUENDO LLP**
28 315 W. 9th Street, Suite 1200
Los Angeles, California 90015
Telephone: (213) 266-5170

Attorneys for Defendant ROBERT
ALIN PILKINGTON

Douglas E. Lumish (SBN 183863)
doug.lumish@lw.com

Gabriel S. Gross (SBN 254672)
gabe.gross@lw.com

Arman Zahoory (SBN 306421)
arman.zahoory@lw.com

Rachel S. Horn (SBN 335737)
rachel.horn@lw.com

LATHAM & WATKINS LLP

140 Scott Drive
Menlo Park, CA 94025
Telephone: (650) 328-4600
Facsimile: (650) 463-2600

Attorneys for Defendant and
Counterclaimant SKYRYSE, INC.

Grant B. Gelberg (SBN 229454)
grant.Gelberg@halpernmay.com

Kevin H. Scott (SBN 274605)
kevin.Scott@halpernmay.com

Alyssa L. Titche (SBN 313296)
alyssa.Titche@halpernmay.com

Catherine Thompson (SBN 313391)
catherine.Thompson@halpernmay.com

HALPERN MAY YBARRA &
GELBERG LLP

550 South Hope Street, Suite 2330
Los Angeles, California 90071
Telephone: (213) 402-1900

Attorneys for Defendant MISOOK
KIM

1 **UNITED STATES DISTRICT COURT**
2
3 **CENTRAL DISTRICT OF CALIFORNIA**

4 MOOG INC.,
5 Plaintiff,
6 v.
7 SKYRYSE, INC., ROBERT
8 ALIN PILKINGTON, MISOOK
9 KIM, and DOES NOS.1-50,
10 Defendants.

Case No. 2:22-cv-09094-GW-MAR

Hon. George H. Wu

**JOINT STIPULATION TO VACATE
ALL HEARING DATES, BRIEFING
DEADLINES, AND CASE
SCHEDULE PENDING
COMPLETION OF SETTLEMENT**

Complaint Filed: March 7, 2022
Counterclaims Filed: January 30, 2023

1 IT IS HEREBY STIPULATED by and between Plaintiff and Counter-
2 Defendant Moog Inc. (“Moog”), Defendant and Counterclaimant Skyrise, Inc.
3 (“Skyrise”), Defendant Misook Kim (“Kim”), and Defendant Robert Alin
4 Pilkington (“Pilkington”) (collectively, the “Parties”) through their respective
5 attorneys of record, as follows:

6 WHEREAS, on September 22, 2023, the Parties executed a binding settlement
7 term sheet and reached an agreement that contemplates the negotiation and
8 execution of a final, long-form settlement agreement;

9 WHEREAS, there are a number of upcoming briefing deadlines and hearings,
10 as well as existing case deadlines pursuant to the Scheduling Order issued by the
11 Court on April 19, 2023 (Dkt. 446);

12 WHEREAS, the Parties agreed that they would stipulate that the Court vacate
13 all pending hearing dates, briefing deadlines, and all dates in the Scheduling Order,
14 and that such stipulation would be filed within 3 days of the date of the term sheet’s
15 execution;

16 WHEREAS, the Parties are now working on negotiating the final, long-form
17 settlement agreement;

18 WHEREAS, the Parties therefore respectfully request an order vacating all
19 pending hearing dates, briefing deadlines, and all dates in the Scheduling Order;

20 WHEREAS, the Parties intend to file requests for dismissal of their respective
21 claims within the next two weeks as long as certain other preconditions contained in
22 the term sheet are met, and therefore request that the Court schedule a status
23 conference at least 45 days out.

24 NOW THEREFORE, subject to the Court’s approval, the Parties stipulate
25 and agree as follows:

- 26 1. All pending hearing dates, briefing deadlines, and dates in the
27 Scheduling Order are vacated;
28

- 1 2. The Court shall schedule a status conference no earlier than 45 days
2 from the date of this filing, and if the Court receives requests for
3 dismissal of all claims and counterclaims before the scheduled status
4 conference, then the Court shall take the status conference off
5 calendar.

6 **IT IS SO STIPULATED.**

7
8
9 Dated: September 25, 2023

10
11 SHEPPARD, MULLIN, RICHTER &
12 HAMPTON LLP

13 By: /s/ Kazim A. Naqvi
14 Kazim A. Naqvi
15 Counsel for Plaintiff and Counterdefendant
16 Moog Inc.

17 LATHAM & WATKINS LLP

18 By: /s/ Gabriel S. Gross
19 Gabriel S. Gross
20 Counsel for Defendant and Counterclaimant
21 Skyryse, Inc.

22 ZWEIBACK Fiset & ZALDUENDO LLP

23 By: /s/ Scott D. Tenley
24 Scott D. Tenley
25 Counsel for Defendant Robert Alin
26 Pilkington

27 HALPERN MAY YBARRA & GELBERG
28 LLP

 By: /s/ Grant B. Gelberg
 Grant B. Gelberg
 Counsel for Defendant Misook Kim

